

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:24 CR 00462
)	
Plaintiff,)	JUDGE DONALD C. NUGENT
)	
v.)	
)	
JOEL ALONTE TRAVIS,)	<u>JOINT PRELIMINARY STATEMENT</u>
)	
Defendant.)	

The United States of America, by and through its counsel, Carol M. Skutnik, Acting United States Attorney, and Michelle M. Baeppler, Assistant United States Attorney, and Scott J. Friedman, Attorney, and Joel Alonte Travis, respectfully submit the following joint preliminary statement in accordance with this Court's Trial Order.

Defendant Joel Alonte Travis is charged in a two-count indictment. Count 1 charges Defendant with Armed Bank Robbery. Count 2 charges Defendant with Using or Carrying and Brandishing a Firearm During and in Relation to a Crime of violence. These crimes are both alleged to have occurred at the Chase Bank, located at 14133 Cedar Road, in South Euclid, Ohio, on or about October 16, 2024. The Chase Bank in South Euclid is located in the Northern District of Ohio, Eastern Division.

Specifically, the United States alleges in Count 1 that Defendant Joel Alonte Travis, and others, by force and violence, or intimidation, did take from the person or presence of bank tellers and other employees at the Chase Bank, located at 14133 Cedar Road, in South Euclid, Ohio, approximately \$126, 380 in monies belonging to, or in the care, custody, control, management, or possession of said bank, the deposits of which were then insured by the Federal

Deposit Insurance Corporation, and in committing such offense, did put in jeopardy the lives of bank employees and others by the use of a dangerous weapon, in violation of Title 18, United States Code, Sections 2113(a) and (d), and 2.

The United States specifically alleges in Count 2 that Defendant Joel Alonte Travis, and others, did use and carry, a firearm, during and in relation to a crime of violence, which may be prosecuted in a court of the United States, to wit: Armed Bank Robbery, and further did brandish said firearm, in violation of Title 18, United States Code Sections 924(c)(1)(A)(ii).

The Defendant has entered a not guilty plea and is presumed innocent of the charges as a matter of Constitutional right.

Respectfully submitted,

/s/ Scott J. Friedman
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